

The Dratch Law Firm, P.C.

Attorneys At Law

Plaza Two

354 Eisenhower Parkway

P.O. Box 472

Livingston, New Jersey 07039-0472

NEW YORK OFFICE  
233 Broadway, Suite 1800  
New York, NY 10279  
(212) 571-1808  
Please reply to NJ Office  
WEBSITE: [www.njcounsel.com](http://www.njcounsel.com)

Main Office (973) 992-3700  
Telecopier (973) 994-0130  
Writer's Direct Dial: (201) 924-4278  
email: [dlebersfeld@gmail.com](mailto:dlebersfeld@gmail.com)

March 17, 2023

**Via EM/ECF**

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut St.  
Newark, New Jersey 07101

Re: *East Orange Bd. of Educ., et al. v. Great Am. Ins. Co.*, No. 2:21-cv-15132-KM-CLW

Dear Judge Waldor:

This firm is counsel to defendant Great American Insurance Company in the above-referenced action. In accordance with Your Honor's instructions contained in the Text Order of February 21, 2023 (ECF # 24), I am writing to inform the Court that my client does not believe that mediation will be productive at this time, which I have communicated to my adversary. Counsel for Plaintiffs and I intend to discuss, and hopefully resolve, confidentiality designations in anticipation of summary judgment motion practice prior to the May 15, 2023 status conference.

The Court's continued attention to this matter is greatly appreciated.

Respectfully submitted,

/s/ *Daniel Lebersfeld*

Daniel Lebersfeld

cc: Counsel of Record (by ECF)